

February 22, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Petition for Declaratory Ruling
IB Docket No. 11-109; ET Docket No. 10-142

Dear Ms. Dortch:

On behalf of Aircado, Inc., I am writing in support of the Petition for Declaratory Ruling filed by LightSquared Inc. on December 20, 2011 and placed on public notice by the Commission on January 27, 2012.

As the Commission knows, LightSquared will operate its planned 4G LTE wireless on a wholesale basis. This approach will enhance competition significantly by facilitating the ability of new providers to enter local, regional, and nationwide markets and serve consumers. For example, Aircado desires to serve customers within very targeted niche market segments. As a small business looking for innovative approaches to address America's broadband needs, Aircado's model has heretofore not been possible without a wholesale network/spectrum backbone upon which to build our retail business.

More specifically, LightSquared's wholesale-only model will allow partners including Aircado to overcome the high barriers to market entry — including potentially prohibitive network deployment and roaming costs, as well as spectrum scarcity — that could otherwise unduly raise their operating costs, or preclude them from operating altogether. Many of our target markets are virtually inaccessible via traditional spectrum acquisition means simply due to the geographic distribution of these segments that would otherwise require purchasing and/or leasing large tracts of spectrum at severely cost-prohibitive expense to our company. With the advent of LightSquared and its unique business approach, we can get to market more rapidly, and we are enabled to deliver **affordable broadband** to America's underserved communities. By affirming LightSquared's rights as described in the Petition, the Commission would facilitate our ability to deliver the tangible benefits of more robust competition to consumers in the form of higher quality service, lower rates, and expanded voice and broadband service options.

At the same time, granting LightSquared's Petition would reinforce the integrity of the Commission's rules, and provide the regulatory certainty necessary for companies like Aircado and LightSquared to attract investment and continue developing innovative communications solutions that truly benefit consumers. It bears emphasis that LightSquared's Petition does *not* ask the Commission to waive its rules or afford LightSquared special treatment in any way. Rather, the Petition merely asks the Commission to affirm its *existing* legal and policy framework for spectrum licensing and usage rights, which (i) has been in place for

decades; (ii) formed the basis for the technical standards developed cooperatively by LightSquared and the commercial GPS industry almost a decade ago; and (iii) has been relied upon by LightSquared and its investors, customers, and others throughout the implementation of the LightSquared network.

Hundreds of millions of American consumers will benefit from the greater competition that will be made possible when LightSquared's network — consistent with the objectives of the *National Broadband Plan* — is approved. Accordingly, I urge the Commission to grant LightSquared's Petition on an expedited basis.

Respectfully submitted,



Loren Wengert
Chief Executive Officer
Aircado, Inc.